

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America
v.

MARCO JIJON RAMIREZ

Case No. 25-mj-1020

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2025 in the county of Robertson in the
Middle District of Tennessee, the defendant(s) violated:

Code Section

Offense Description

Title 8, United States Code
Sections 1326(a)

Illegal re-entry of removed alien.

This criminal complaint is based on these facts:

See Attached statement in support of complaint

☒ Continued on the attached sheet.

/s/ Jacqueline Richards

Complainant's signature

SA Jacqueline Richards HSI

Printed name and title

Sworn to me remotely by telephone, in compliance with
Fed. R. Crim. P. 4.1.

Date: 01/31/2025


Judge's signature



City and state: Nashville, Tennessee

Hon. Barbara D. Holmes, U.S. Magistrate Judge

Printed name and title

STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jacqueline A. Richards, having been duly sworn, hereby depose and swear to the following:

1. I, Jacqueline A. Richards, am a Special Agent with the U.S. Department of Homeland Security, specifically the U.S. Immigration and Customs Enforcement Agency, Homeland Security Investigations, currently assigned to the Middle District of Tennessee. I have been so employed since November of 2009. As a federal agent for the U.S. Department of Homeland Security, I am familiar with federal statutes, including: 8 U.S.C. § 1326(a), which makes it unlawful for a removed alien to be present in the United States without authorization. I am also familiar with 8 U.S.C. 1325(a), unlawful entry into the United States by an alien.

2. The facts contained in this affidavit are based on first-hand knowledge or on information learned during this investigation from law enforcement sources or from witnesses. This affidavit does not contain each and every detail known by me regarding this investigation. Instead, this affidavit provides information necessary to establish probable cause to arrest the defendant, Marco JIJON RAMIREZ, for a violation of 8 U.S.C. § 1326(a). Except where indicated, all statements referenced herein are set forth in substance and in part, rather than verbatim.

3. The Defendant is a Mexican citizen and alien to the United States. The Defendant has been removed from the United States multiple times pursuant to a valid removal order. The Defendant has not received express consent to reapply for admission into the United States from the United States Attorney General and/or the Secretary of Homeland Security.

4. On or about January 6, 2025, Immigration and Customs Enforcement employees found the Defendant at the Robertson County (Tennessee) jail after he was arrested for Domestic Assault. On or about January 14, 2025, the Defendant pled guilty to Domestic Assault and was sentenced to 11 months and 29 days which was suspended with a credit of 32 hours.

5. On or about June 28, 2021, the Defendant was arrested in Tennessee for driving under the influence and other traffic violations and pled guilty. The Defendant's sentence was suspended all but 48 hours, with supervised probation, no driving privileges in Tennessee for one year, and DUI class.

6. On or about July 17, 2017, the Defendant was encountered by an immigration officer and was removed from the United States in Alexandria, Louisiana, on or about August 9, 2017.

7. On or about July 18, 2016, the Defendant was encountered by U.S. Border Patrol in Arizona. On or about July 19, 2016, the Defendant was convicted of violating 8 U.S.C. § 1325 and sentenced to 180 days of imprisonment. The Defendant was then removed from the United States in El Paso, Texas, on or about January 24, 2017.

8. On or about June 5, 2016, the Defendant was encountered by an immigration officer and was removed from the United States in Calexico, California, on or about June 7, 2016.

9. On or about May 24, 2016, the Defendant was arrested in Kentucky for driving under the influence and other traffic violations and sentenced to 30 days in jail.

10. On or about March 12, 2016, the Defendant was arrested in Kentucky for driving under the influence, open alcohol container, and other traffic violations. On or about March 14, 2016, the Defendant was encountered by an immigration officer and was removed from the United States in El Paso, Texas, on or about April 26, 2016.

11. The Defendant was encountered by an immigration officer on or about December 12, 2007, was issued a Notice to Appear and ordered removed by an Immigration Judge. The Defendant was removed from the United States in Miami, Florida, on or about May 17, 2008.

12. On or about November 21, 2007, the Defendant was arrested in Florida for battery.

13. On or about February 8, 2006, the Defendant was arrested in Florida for battery.

14. On or about March 23, 2005, the Defendant was arrested in Florida for failure to appear.

15. On or about November 9, 2004, the Defendant was arrested in Florida and convicted for battery with intent to cause bodily harm (sentenced to 1-year probation), harassment/intimidation of a witness, victim or informant (sentenced to probation for 3 years, 8 days), and fraud/impersonation (sentenced to one 1-year probation).

16. On or about March 16, 2004, the Defendant was arrested in Florida for no driver's license.

17. On or about February 8, 2004, the Defendant was cited in Florida for no driver's license.

Therefore, I am requesting a warrant authorizing the arrest of Marco JIJON RAMIREZ, for a violation of 8 U.S.C. § 1326(a).